

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Adoption of a Mandatory FCC)	MD Docket No. 00-205
Registration Number)	

COMMENTS

The National Exchange Carrier Association, Inc. (NECA) submits these comments in the matter captioned above.¹ The Commission proposes to require persons and entities doing business with it to secure a "unique" identifying number, which it calls the FCC registration number (FRN).² The 10-digit FRN, assigned by the Commission Registration System (CORES), would be supplied by parties in connection with: contributions to the Universal Service Fund; collection of regulatory and application fees; auction payments; auction loan payments; and any other filing requiring the payment of a fee.³

NECA is interstate tariff filing agent for more than 1200 incumbent local exchange telephone companies.⁴ NECA's comments address potential administrative issues that may arise in regard to proposed requirements for FRNs in this context.

¹ In the Matter of Adoption of a Mandatory FCC Registration Number, MD Docket No. 00-205, *Notice of Proposed Rulemaking*, FCC 00-421 (rel. Dec. 1, 2000) (NPRM).

² NPRM at paras. 18 - 22.

³ *Id.*

⁴ See 47 C.F.R. § 69.601. NECA's Tariff FCC Number 5, Access Service, includes 1250 local exchange carriers.

NECA's tariff transactions with the Commission are extensive. In an average year, NECA submits approximately 45 tariff filings to the Commission, including transmittals to maintain and update the NECA Access Service tariff (Tariff F.C.C. No. 5); and the Wire Center and Interconnection Information tariff (Tariff F.C.C. No. 4). These filings are accompanied by the required filing fees. In addition, NECA submits complete base tariffs each month for Tariffs F.C.C. No. 4 and No. 5 as required by Commission rules. These monthly submissions do not require the payment of any filing fees. All of these filings and submissions are accomplished via the Internet, using the Commission's on-line Electronic Tariff Filing System (ETFS), in compliance with Commission rules.

Rule language proposed by the Commission states, in part, "(t)he FRN must be provided with any filings requiring the payment of statutory charges under subpart G of this part" ⁵ Further, the Commission "propose(s) that counsel or other representatives that makes fee payments on behalf of one or more clients should provide their FRN and the FRN of the client or clients with the payments." ⁶

While NECA believes it is not the Commission's intent to require NECA to include individual FRNs for each of the carriers participating in its tariffs, ⁷ the NPRM seems to suggest otherwise. Thus, the Commission should make clear that, as authorized filing agent for its various tariff-participating members, NECA will submit its own FRN

⁵ NPRM, *Appendix*, p. 13, proposed new Subpart W - FCC Registration Number, § 1.8003.

⁶ *Id.*, para. 20.

⁷ *Id.*, para. 7. "The Commission intends to use the information to verify that entities doing business with the Commission have made proper payments, and to mail annual fee schedules and other materials." In exercising its responsibility for filing tariffs on behalf of its members, NECA is the party required to submit a filing fee.

with each tariff filing requiring a fee payment, but that submission of FRNs for each participating carrier in NECA's tariff is not necessary.

As noted above, the Commission's ETFS also handles tariff submissions that do not require payment of a filing fee. The Commission should clarify that ETFS will continue to distinguish between tariff transmissions requiring a fee and those not requiring a fee, and that those not requiring fees also will not require entry of a FRN in ETFS.

The NPRM also seeks comment on whether the Commission should limit the number of FRNs that an entity may obtain, and whether a new form should be adopted that would enable the Commission to "identify and link all related entities."⁸ The CORES web site currently indicates that entities may acquire more than one unique FRN.⁹ Although the instructions state that entities are responsible for providing correct FRNs,¹⁰ allowing single legal entities to obtain multiple FRNs creates some potential confusion. If the Commission decides to continue the practice of providing multiple FRNs to the same legal entity, it should, at a minimum, establish a system to link related entities.

⁸ *Id.*, para. 15.

⁹ See Commission Registration System web site, *Frequently Asked Questions*, "A unique FRN is assigned to each entity that registers. If you register your entity again, another unique FRN will be assigned. Entities may have a good reason to obtain another FRN. For instance, an entity may want a FRN for each line of business. However, an entity with more than one FRN will be responsible for using the proper FRN for each transaction." <https://gulfoss2.fcc.gov/cores/CoresHome.html> (visited January 16, 2001).

¹⁰ *Id.*

Finally, the Commission may also wish to consider using a different standard abbreviation for 'FCC registration number', to avoid confusion with use of the same abbreviation in the Commission's e-rate program. In that context, telecommunications providers, many of which are incumbent local exchange carriers, are assigned "FRNs" (meaning "funding request numbers") for purposes of transacting with the Schools and Libraries Division of the Universal Service Administrative Company. The same entities that are assigned "FRNs" for the e-rate program will be assigned different "FRNs" for FCC transactions, leading to potential confusion. This perhaps could be avoided by referring to FCC registration numbers as "FCCRN." "

Respectfully submitted,

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Certificate of Service

I hereby certify that a copy of the Comments was served this 16th day of January 2001, by electronic delivery or first class mail, to the persons listed below.

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